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16 Attorneys for Defendant
17 Otto Trucking LLC

18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 WAYMO LLC,
22 Plaintiff,
23 v.
24 UBER TECHNOLOGIES, INC.;
25 OTTOMOTTO LLC; OTTO TRUCKING
26 LLC,
27 Defendants.

Case No. 3:17-cv-00939-WHA

**OTTO TRUCKING LLC'S NOTICE TO
JOIN AND ADOPT DEFENDANTS UBER
TEHCNOLOGIES, INC. AND
OTTOMOTTO, LLC'S MOTION FOR
SUMMARY JUDGMENT, MOTION TO
STRIKE TS 96, AND DAUBERT MOTION**

Hearing Date: September 20, 2017
Hearing Time: 8:00 a.m.
Judge: Hon. William H. Alsup
Courtroom: 8, 19th Floor
Trial Date: October 10, 2017

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT Defendant Otto Trucking, LLC (“Otto Trucking”) hereby
3 joins and adopts Co-Defendants Uber Technologies, Inc.’s (“Uber”) and Ottomotto, LLC’s
4 (“Ottomotto”) Motion for Summary Judgment, Motion to Strike TS 96, and Daubert Motion (Dkt.
5 1514). In support, Otto Trucking states as follows:

6 1. On June 7, 2017, the Court issued a Case Management Scheduling Order requiring
7 Waymo to reduce its list of 121 purported trade secrets to a final “lineup of trade secrets to be tried”
8 that was “less than ten” by August 1, 2017 [Dkt. 563].

9 2. On August 1, 2017, Waymo served its Notice Regarding Trade Secret Narrowing.

10 3. On August 7, 2017, Co-Defendants Uber and Ottomotto submitted its Motion to
11 Strike Vague and Overbroad Trade Secret Claims [Dkt. 1108].

12 4. On August 23, 2017, the Court held a hearing regarding Waymo’s TS No. 96.

13 5. On August 24, 2017, Plaintiff Waymo served its expert report of Lambertus
14 Hesselink.

15 6. On September 6, 2017, the Court held a second hearing regarding Waymo’s TS No.
16 96.

17 7. Otto Trucking joins and adopts, as if set out verbatim herein, the arguments,
18 authorities, contentions, and prayers of Co-Defendants Uber and Ottomotto set forth in Docket No.
19 1514 for the reason that said response is equally applicable to Otto Trucking in the above-captioned
20 matter.

21 8. Otto Trucking incorporates by reference as equally applicable here Otto Trucking’s
22 arguments made in its own Motion for Summary Judgment on August 31, 2017 [Dkt. 1423].

23 9. Otto Trucking joins and adopts Co-Defendants’ Motion to Strike to best serve justice
24 and avoid unnecessary or duplicative effort, time, or expense to the parties involved.

25 WHEREFORE, Defendant Otto Trucking LLC hereby joins and adopts Co-Defendants’
26 Motion for Summary Judgment, Motion to Strike TS 96, and Daubert Motion (Dkt. 1514).

27 Dated: September 11, 2017

Respectfully submitted,

By: /s/ Neel Chatterjee

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Attorneys for Defendant
Otto Trucking LLC

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on September 11, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 11th day of September 2017.

/s/ Neel Chatterjee
Neel Chatterjee